

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation;
and VERA BRADLEY DESIGNS, INC., an
Indiana corporation,

Plaintiffs,

V.

ZHEN WANG "JOHNNY" ZHANG, an individual; FABBY GLOBAL TRADING, LLC d/b/a "CALIBEAN COLLECTION," a Texas limited liability corporation; UNIVERSAL EXPO GROUP INC., a Texas corporation; and JOHN DOES 1-10:

Defendants.

No. 2:18-cv-00352-RSM

STIPULATED PERMANENT INJUNCTION

STIPULATION

Plaintiffs Amazon.com, Inc. (“Amazon”) and Vera Bradley Designs, Inc. (“Vera Bradley”), and Defendants Zhen Wang “Johnny” Zhang, Fabby Global Trading, LLC d/b/a “Calibean Collection”, and Universal Expo Group Inc. (collectively, “Defendants”), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. The Court may enter the following permanent injunction.

2. Defendants hereby fully and irrevocably consent to the jurisdiction of the state and federal courts in King County, Washington, in any action or proceeding in which Amazon

1 or Vera Bradley seeks to enforce this injunction or otherwise stemming from Defendants'
2 noncompliance with this injunction.

3 DATED: January 30, 2020

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5 *Vera Bradley Designs, Inc.*

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PERMANENT INJUNCTION

Pursuant to the terms of the settlement agreement reached in this matter, including the parties' agreement to stipulate to a permanent injunction, IT IS HEREBY ORDERED that Defendants, their agents, representatives, employees, successors, and assigns are permanently enjoined and restrained from:

1. selling, offering for sale, advertising, marketing, shipping, transmitting, or distributing to Amazon, or to any other person or entity through any of Amazon's websites, any product or service;

2. applying for, opening, operating, controlling or using any Amazon seller or vendor account, or applying for or participating in any Amazon Affiliate Program;

3. manufacturing, distributing, offering to sell, or selling any product or service that incorporates Vera Bradley's brand, trademarks, or copyrights, or otherwise uses Vera Bradley's brand, trademarks, or copyrights to manufacture, distribute, offer, or sell any product or service; and

4. assisting, aiding, or abetting any other person or entity in engaging in or performing any of the activities listed above.

IT IS SO ORDERED.

DATED: February 3, 2020



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

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